

**August 25, 2010 Comments on the EPA CASAC Particulate Matter Review Panel Draft Letter on
Policy Assessment for the Review of Particulate Matter National Ambient Air Quality Standard—
Second External Review Draft (June 2010)**

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First of all, let me apologize in case a train goes by my office and you hear it. It's just my location. First I would like to thank Dr. Samet and the rest of the advisory committee for the opportunity to speak today. My name is Joel Sherman and I am the Director of regulatory compliance for Grimmway Enterprises, Inc. Grimmway is one of the largest growers, packers and shippers of carrots, carrot products and organic vegetables in the United States. We farm throughout California and provide jobs to approximately 7,000 people. We consider it an honor to grow healthy products that find their way onto virtually every table in the United States including Canada. We firmly believe that farmers are the original environmentalists and we at Grimmway are just as serious about our responsibility to uphold farming's rich tradition as stewards of the land.

All of us want clean air and water and we all applaud and support well researched and well reasoned efforts to improve the quality of our daily lives. However, we believe that such efforts must not be created in a vacuum. They must be balanced against many competing but equally important factors including job creation, the cost of living, and maintaining a level playing field with respect to the domestic and foreign competition.

I'm not here to dispute the science but suffice it to say that, our farming experience coupled with our own understanding of the scientific process and recent events regarding scientific credibility have reinforced our skepticism about your opinions regarding the health effects of fine particulate air pollution.

Furthermore, the economic impact of additional regulations on farming, transportation and the construction industries has been grossly underestimated. Due to the diverse nature of our operations, we at Grimmway are faced with an increasingly complex regulatory environment. In the area of diesel engines alone, we must juggle numerous differing and competing requirements concerning our on road vehicles, off road vehicles, stationary sources and TRU's just to name a few.

The cost of replacing or retrofitting these engines will further diminish our competitiveness in an increasingly global economy. The financial impact will adversely affect our company, our employees and the communities in which we do business. It is especially frustrating to have this discussion at a time when much of our country is struggling economically. National unemployment rates are alarmingly high. The county in which we do the majority of our farming has one of the highest unemployment rates in California. Around 38%. Additional regulation will only increase our financial burden and make it harder to create and sustain jobs. Especially at a time when job creation is of such vital importance.

Certainly we all understand the need to protect the health of every citizen. To that end, our company grows vegetables both conventional and organic while at the same time, protecting those natural resources for which we are responsible. But a recent study of 56 of California's 58 counties identified poverty as one of the key factors dictating poor health in a given community. But higher employment levels generally lead to better health. Increased regulation will undoubtedly lead to increased health problems.